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June 23, 2021

The Honorable Jessica Rosenworcel
Acting Chairwoman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: ***Rural Digital Opportunity Fund***
AU Docket No. 20-34 and WC Docket Nos. 10-90 & 19-126
Ex Parte Communication

Dear Acting Chairwoman Rosenworcel:

The Wireless Internet Service Providers Association (“WISPA”) recently developed a multi-faceted policy initiative called the “Path to Gigabit.” This initiative proposes a number of policy objectives that would help broadband service providers lead the effort to achieving the Gigabit future. A document describing WISPA’s “Path to Gigabit” is attached.

WISPA members build tomorrow’s broadband solutions today. These small- and medium-sized businesses have been building innovative networks for more than twenty years and currently connect seven million Americans. Using a combination of next generation fixed wireless and fiber technologies, they rapidly deliver affordable, future-proof connectivity to those in unserved, underserved, and marginalized areas of America.

We are filing the “Path to Gigabit” document in the Rural Digital Opportunity Fund docket because, among other things, WISPA acknowledges the Commission’s desire to prioritize subsidizing areas that truly lack broadband access. To help achieve this goal, WISPA has supported, and continues to support, the Commission’s efforts to make broadband mapping more accurate and more granular. WISPA agrees with many policymakers and stakeholders who believe that developing accurate data about “where broadband is and is not” is a necessary first step before awarding subsidies to spur broadband deployment. We look forward to further engagement with the Commission on this essential input.

For the reasons outlined by the attached “Path to Gigabit” document, WISPA believes that, to connect all Americans to fast broadband speeds, symmetrical broadband speeds are not necessary. Consumers typically use at least ten times more download bandwidth than upload bandwidth. Therefore, data about consumer broadband usage does not support a subsidy policy that would require only 100/100 Mbps speeds at the exclusion of asymmetrical speeds that better reflect consumer usage and do not foreclose certain competitive alternatives such as fixed wireless broadband that may lack the spectrum to achieve 100/100 Mbps speeds. Moreover, fixed wireless broadband can be deployed much more quickly than wireline technologies and can be upgraded with software over time as equipment keeps pace with any increase in consumer



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demand for faster upload speeds. This innovation, coupled with the success of fixed wireless providers in winning Connect America Fund and Rural Digital Opportunity Fund support, is encouraging unprecedented investment in fixed wireless networks. With smart policy that enables all technologies and deployment architectures to participate in funding programs, WISPA members will play a key role in the “Path to Gigabit.”

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being filed in ECFS in above-referenced dockets. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Louis Peraertz

Louis Peraertz, Vice President of Policy

Attachment

cc: Travis Litman
Ramesh Nagarajan



Path to Gigabit

Unfortunately, millions of Americans are still on the wrong side of our connected future.

Smart and tailored policy solutions can connect communities to affordable, future-proof broadband today without the need to spend billions more over the next few years.

WISPA members build tomorrow's broadband solutions today. These small and medium sized businesses have been building innovative networks for over twenty years and currently connect seven million Americans. Using a combination of next generation wireless and fiber technologies, they rapidly deliver affordable, future-proof connectivity to those in unserved, underserved, and marginalized areas of America.

These innovators are the reason why the digital divide is smaller today than it was 10 years ago, and with smart policy solutions, Congress can harness the power of these companies to quickly deliver gigabit connectivity throughout the United States. Here is a blueprint for doing just that:

Localize Spectrum Policy to Supercharge Competition

WISPA members are local and regional companies that develop solutions for everyone from urban office dwellers to rural farmers and beyond. Some deliver unsubsidized gigabit broadband today; many more will do so tomorrow with smart spectrum policy:

- Identify at least 200 megahertz of mid-band spectrum for coordinated, non-auctioned, high-powered, point-to-multipoint use, on either a shared or licensed-by-rule basis, in order to serve suburban and rural America. Mid-band spectrum is flexible and capable of providing high speed effective service to a wide range of homes and businesses.
- Promote affordable higher speed broadband services for urban America by allocating more millimeter wave spectrum available on a shared basis so that small, medium, and large providers can use it to relieve congestion in urban areas.
- Optimize lower spectrum bands for fixed wireless use so they can help connectivity go the distance.
- Supercharge competition everywhere by adopting a use it or share it policy for unused licensed spectrum, government or commercial. Spectrum is currently available, but if licensees do not deploy it, it won't be put to its highest and best use for the benefit of the millions of Americans who need access today. Without a single subsidy dollar, these policies will enable gigabit connectivity and competition nationwide.

Use Best-in-Class Data to Develop Futureproof Subsidy Programs

We recognize that federal and state dollars can accelerate this process. The most prudent use of funds would rely on the use of complete mapping data to target investments to the truly unserved first, and avoid overbuilding existing investments. Thanks to the bipartisan work of Congress on the Broadband Data Act, we expect this data to be available soon. However, should Congress move forward now,

leveraging the expertise and infrastructure of local providers will result in significant CBO scoring savings today while still delivering capabilities of the future:

- *Meet consumers where they are and where they will be* – Since the dawn of the internet, consumers have used more download bandwidth than upload bandwidth, often by a factor of 10:1. Funding programs should recognize that just as consumer demands evolve, so too will the networks that drive them. Unlike incumbent providers that need never-ending billion-dollar subsidies to deploy, maintain, and upgrade networks, innovative technology like fixed wireless equipment is quickly upgraded, often by a software update, at a fraction of the time and cost.
- *Leverage private investment to grow networks* – Getting broadband to consumers quickly means both consumers and providers will begin to reap benefits. The consumer has meaningful connectivity and the provider can leverage real cashflow to further invest in its network. Evolving speed standards means a consumer can have robust connectivity today, and the provider can continue upgrading its networks in anticipation of future consumer demands. A win-win for the American consumer- high-speed connectivity today and unlimited access to the applications and innovations of the future. Funding programs should prioritize rapid deployment by providers capable of operating sustainable networks independent of ongoing subsidies.

Utilizing these principles, in a technology neutral manner, will enable more Americans to access gigabit broadband both today and tomorrow and could save taxpayers billions of dollars in subsidies over the next several years.

Align Infrastructure Policy to Unleash Competition by Small Innovators

Competition is often hampered by unnecessary roadblocks to critical infrastructure like utility poles and rights of way. Ensuring that innovators and entrepreneurs can easily access infrastructure will boost competition from urban centers to rural farmland.

- *Cost-effective access to poles and rights of way for all broadband providers*– Innovators should be eligible for the same infrastructure rights as large incumbents. This should include cooperative and municipal facilities and should not require specialized regulatory designations.
- *Dig once* – Allow all parties to rapidly deploy infrastructure in a cost-effective manner.
- *Resilience*- From earthquakes to hurricanes and everything in between, America's networks must not only withstand threats from natural disasters but also be quickly and cost-effectively rebuilt when, inevitably, disaster strikes.

With fast and fair access to infrastructure, broadband providers can ensure access for under-served and unserved communities, putting them on the road to gigabit connectivity now rather than years from now.

Promote Digital Adoption and Inclusion

Service affordability, digital literacy, and device access remain significant barriers to full participation in an increasingly digital world. Deployment of services is only one side of the equation.

- Where Americans do have access, its adoption is not a forgone conclusion. The cost of service can be out of reach for those struggling to make ends meet. Programs like the Emergency

Broadband Benefit- made permanent- allow all families, regardless of income, afford the high-speed internet plan of their choice.

- And, even where cost is not an issue, adoption can be thwarted for those who do not understand the importance of Internet connectivity. Whether it is an isolated grandmother, unsure of how to navigate the internet or a Veteran who guards his privacy closely, digital literacy and adoption programming brings the promise of the internet to those who don't yet know its value.

Programs should encourage and fund local entities that are already on the ground doing meaningful work to expand access to marginalized individuals and communities, especially those who are currently under - or unserved.

There is no one-size-fits-all solution to America's connectivity gap. From terrain to climate to the very bedrock they live and play upon, American communities are as different in its network deployment needs as the people who call these communities home. A federal policy framework that allows for a flexible and hybrid approach to deployment will allow service providers to deploy the technology that best meets the needs of the communities they serve – today and well into the future. This path to gigabit, and beyond, leverages today's communications landscape for the needs of tomorrow.